

April 6, 2022

VIA ECF

The Honorable P. Kevin Castel  
United States District Judge  
Daniel Patrick Moynihan, United States Courthouse  
500 Pearl St., Courtroom 11D  
New York, New York 10007

**Re: *In re Google Digital Advertising*, 1:21-md-03010 (PKC) (all actions)**

Dear Judge Castel:

On behalf of all parties to the above-referenced MDL, the parties jointly submit the attached draft confidentiality order. This draft is a supplement to the three letters being filed simultaneously by the Plaintiffs, Google, and Meta concerning the remaining disputes among them regarding certain proposed confidentiality order provisions. This draft contains all confidentiality provisions the parties agree upon, as well as those the parties don't agree upon. As to the disagreements, this joint submission identifies the competing language being proposed by each party. The parties thought it would assist the Court to have a single proposed confidentiality order, with the parties' agreed upon provisions, and their disagreements inline in the proposed order.

The parties thank the Court in advance for its consideration of these issues.

Respectfully submitted,

/s/ W. Mark Lanier

W. Mark Lanier  
New York Bar No.: 4327284  
Mark.Lanier@LanierLawFirm.com  
Alex J. Brown  
New York Bar No.: 4593604  
Alex.Brown@LanierLawFirm.com  
Zeke DeRose III  
Zeke.DeRose@LanierLawFirm.com  
Tower 56  
126 East 56th Street, 6th Floor  
New York, NY 10022  
(212) 421-2800  
THE LANIER LAW FIRM, PLLC

/s/ Ashley Keller

Ashley Keller  
ack@kellerlenkner.com  
Brooke Clason Smith  
brooke.smith@kellerlenkner.com  
Jason A. Zweig  
New York Bar No.: 2960326  
jaz@kellerlenkner.com  
150 N. Riverside Plaza, Suite 4100  
Chicago, Illinois 60606  
(312) 741-5220  
Zina Bash  
zina.bash@kellerlenker.com  
111 Congress Avenue, Suite 500  
Austin, TX 78701  
(512) 690-0990  
KELLER LENKNER LLC

*Counsel for Texas, Idaho, Indiana, Louisiana (The Lanier Law Firm only), Mississippi, North Dakota, South Carolina, and South Dakota*

*On behalf of the State Plaintiffs*

/s/ Dena C. Sharp

Dena C. Sharp (*pro hac vice*)  
Jordan Elias (*pro hac vice*)  
Scott M. Grzenczyk (*pro hac vice*)  
**GIRARD SHARP LLP**  
601 California Street, Suite 1400  
San Francisco, CA 94108  
Tel: (415) 981-4800  
Fax: (415) 981-4846  
dsharp@girardsharp.com  
jelias@girardsharp.com  
scottg@girardsharp.com

Tina Wolfson (TW-1016)  
Theodore W. Maya (*pro hac vice*)  
Bradley K. King (BK-1971)  
**AHDOOT & WOLFSON, PC**  
2600 West Olive Ave., Suite 500

/s/ John Thorne

John Thorne  
Daniel G. Bird  
Daniel V. Dorris  
Bethan R. Jones  
Mark P. Hirschboeck  
Eliana M. Pfeffer  
Eric J. Maier  
KELLOGG, HANSEN, TODD, FIGEL &  
FREDERICK, P.L.L.C.  
1615 M Street NW, Suite 400  
Washington, DC 20036  
Tel: (202) 326-7900  
Fax: (202) 326-7999  
jthorne@kellogghansen.com

Jeffrey A. Lamken  
Caleb Hayes-Deats

Burbank, CA 91505  
Tel.: (310) 474-9111  
Fax: (310) 474-8585  
twolfson@ahdootwolfson.com  
tmaya@ahdootwolfson.com  
bkings@ahdootwolfson.com

*Interim Co-Lead Counsel for Advertiser Plaintiffs*

/s/ Caitlin G. Coslett  
Eric L. Cramer  
ecramer@bm.net  
Michael C. Dell'Angelo  
mdellangelo@bm.net  
Caitlin G. Coslett  
ccoslett@bm.net  
Patrick F. Madden  
pmadden@bm.net  
BERGER MONTAGUE PC  
1818 Market St., Suite 3600  
Philadelphia, PA 19103  
Telephone: (215) 875-3000

Philip C. Korologos  
pkorologos@bsflp.com  
Brianna S. Hills  
bhills@bsflp.com  
BOIES SCHILLER FLEXNER LLP  
55 Hudson Yards, 20th Floor  
New York, NY 10001  
Telephone: (212) 446-2300

David Boies  
dboies@bsflp.com  
BOIES SCHILLER FLEXNER LLP  
333 Main Street  
Armonk, NY 10504  
Telephone: (914) 749-8200

Jesse Panuccio  
jpanuccio@bsflp.com  
BOIES SCHILLER FLEXNER LLP  
1401 New York Avenue, NW  
Washington, DC 20005

MOLOLAMKEN LLP  
Tel: (202) 556-2000  
Fax: (202) 556-2001  
jlamken@mololamken.com

*Counsel for Associated Newspapers, Ltd. and Mail Media, Inc.*

/s/ Serina M. Vash  
Serina M. Vash  
New York Bar No.: 2773448  
svash@hermanjones.com  
153 Central Avenue, # 131  
Westfield, NJ 07090  
(404) 504-6516  
HERMAN JONES LLP

John C. Herman  
jherman@hermanjones.com  
3424 Peachtree Road, N.E., Suite 1650  
Atlanta, GA 30326  
(404) 504-6500  
HERMAN JONES LLP

Paul T. Farrell, Jr.  
paul@farrellfuller.com  
Michael J. Fuller, Jr.  
mike@farrellfuller.com  
1311 Ponce De Leon, Suite 202  
San Juan, PR 00907  
(939) 293-8244  
FARRELL & FULLER, LLC

/s/ Stuart A. Davidson  
Paul J. Geller  
pgeller@rgrdlaw.com  
Stuart A. Davidson  
sdavidson@rgrdlaw.com  
Alexander C. Cohen  
acohen@rgrdlaw.com  
Maxwell H. Sawyer  
msawyer@rgrdlaw.com  
120 East Palmetto Park Road, Suite 500

Telephone: (202) 895-7580

Mark C. Mao

mmao@bsfllp.com

Sean P. Rodriguez

srodriguez@bsfllp.com

BOIES SCHILLER FLEXNER LLP

44 Montgomery Street, 41st Floor

San Francisco, CA 94104

Telephone: (415) 293-6820

Sabria A. McElroy

smcelroy@bsfllp.com

BOIES SCHILLER FLEXNER LLP

401 E. Las Olas Blvd., Suite 1200

Fort Lauderdale, FL 33301

Telephone: (954) 377-4216

*Interim Co-Lead Counsel for the Publisher Class*

Boca Raton, FL 33432

(561) 750-3000

ROBBINS GELLER RUDMAN & DOWD  
LLP

David W. Mitchell

davidm@rgrdlaw.com

Steven M. Jodlowski

sjodlowski@rgrdlaw.com

655 West Broadway, Suite 1900

San Diego, CA 92101

(619) 231-1058

ROBBINS GELLER RUDMAN & DOWD  
LLP

Robert P. Fitzsimmons

bob@fitzsimmonsfirm.com

Clayton J. Fitzsimmons

clayton@fitzsimmonsfirm.com

Mark A. Colantonio

mark@fitzsimmonsfirm.com

1609 Warwood Avenue

Wheeling, WV 26003

(304) 277-1700

FITZSIMMONS LAW FIRM PLLC

*Counsel for Direct Action Newspaper Plaintiffs*  
AIM Media Indiana Operating, LLC, AIM Media  
Midwest Operating, LLC, AIM Media Texas  
Operating, LLC, Brown County Publishing  
Company, Inc. and Multi Media Channels, LLC,  
Clarksburg Publishing Company, d/b/a WV News,  
Coastal Point LLC, Eagle Printing Company,  
Ecent Corporation, Emmerich Newspapers,  
Incorporated, J.O. Emmerich & Associates, Inc.,  
Delta Democrat Publishing Company,  
Commonwealth Publishing Company, Inc., Delta  
Press Publishing Company, Inc., Newton County  
Appeal Inc., Marion Publishing, Company, Yazoo  
Newspaper, Co., Inc., Sunland Publishing,  
Company, Inc., Simpson Publishing Co., Inc.,  
Montgomery Publishing Co., Inc., Franklinton  
Publishing Co., Inc., Charleston Publishing Co.,  
Inc., Clarion Publishing Company, Inc., Scott

*Publishing, Inc., Clarke Publishing, Inc.,  
Hattiesburg Publishing, Inc., Tallulah Publishing,  
Inc., Louisville Publishing, Inc., Kosciusko Star  
Herald, Inc., Enterprise-Tocsin, Inc., Grenada Star,  
Inc., Tate Record Inc., Flag Publications, Inc., Gale  
Force Media, LLC,  
HD Media Company, LLC, Journal Inc., Robinson  
Communications, Inc., Something Extra Publishing,  
Inc., Rome News Media, LLC, Times Journal, Inc.,  
Neighbor Newspapers, Savannah Publishing Co.,  
Inc., Gould Enterprises, Inc., Union City Daily  
Messenger, Inc., Weakley County Press, Inc., and  
Southern Community Newspapers, Inc.*

/s/ Kevin J. Orsini

Kevin J. Orsini  
Cravath, Swaine & Moore LLP  
Worldwide Plaza  
825 Eighth Avenue  
New York, NY 10019-7475  
T: (212) 474-1000  
F: (212) 474-3700  
korsini@cravath.com

Attorneys for Defendant Meta Platforms, Inc.

/s/ Eric Mahr

Eric Mahr  
FRESHFIELDS BRUCKHAUS DERINGER  
US LLP  
700 13th Street, NW  
10th Floor  
Washington, DC 20005  
Telephone: (202) 777-4545  
Email: eric.mahr@freshfields.com

Justina K. Sessions  
WILSON SONSINI GOODRICH &  
ROSATI  
Professional Corporation  
One Market Plaza  
Spear Tower, Suite 3300  
San Francisco, California 94105  
Telephone: (415) 947-2197  
Email: jsessions@wsgr.com

Counsel for Defendants Google LLC, Alphabet  
Inc., and YouTube LLC